

June 25, 2018

Via Hand Delivery
Ms. Marlene H. Dortch
Secretary
Fodoral Communications Commission

Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re: Promoting Telehealth and Telemedicine in Rural America, WC Docket No. 17-310

Dear Ms. Dortch,

TeleQuality Communications, LLC ("TeleQuality") hereby submits for the Commission's approval additional interstate rural rates for purposes of providing service to healthcare providers ("HCPs") through the Rural Health Care Telecommunications Program.

TeleQuality is currently working with HCPs seeking telecommunications services for 2018 through the Telecommunications Program. To establish its rural rates for 2018, TeleQuality has followed the requirements of 47 C.F.R. § 54.607 and the recent USAC guidance. TeleQuality does not provide service to commercial customers other than HCPs, so it cannot calculate rural rates based on the average rate charged to commercial customers for similar services pursuant to 47 C.F.R. § 54.706(a) (USAC's Method 1). In some cases, TeleQuality may be able to establish a rural rate by calculating the average of tariffed or other publicly available rates for similar services in the same rural area pursuant to 47 C.F.R. § 54.706(b) (USAC's Method 2). In cases where due diligence has not revealed any tariffed or other publicly available rates for "the same or similar services in that rural area over the same distance as the eligible service," or where TeleQuality has reasonably determined that Method 2 results in a rate that is "unfair," TeleQuality must submit its rates for interstate services to the Commission for approval pursuant to 47 C.F.R. § 54.607(b) (USAC Method 3).

Attached please find TeleQuality's interstate rates for the Telecommunications Program for Funding Year 2018 (shown in Attachment 1 as the TeleQuality 2018 Interstate Rate Sheet) for areas served using USAC Method 3. Also attached, as required by 47 C.F.R. § 54.706(b)(1), is the justification for TeleQuality's rural rates including cost itemizations (shown in Attachment 2 as the TeleQuality 2018 Interstate Rate Cost Justification).

These rates are all for services that are interstate interexchange and/or CLEC business data services, and which were subject to competitive bidding. As such, these are all services that

¹ USAC, *Telecom Program: Urban and Rural Rates*, https://www.usac.org/_res/documents/rhc/pdf/handouts/TelecomRuralUrbanRateInfo.pdf.

Ms. Marlene H. Dortch June 25, 2018 Page 2 of 4

the Commission has mandatorily or permissively detariffed because of the presence of a competitive market. See 47 C.F.R. § 61.19; Hyperion Telecommunicatons Inc. Petition Requesting Forbearance, Memorandum Opinion and Order and Notice of Proposed Rulemaking, 12 FCC Rcd 8596 (1997) ("[W]e have previously determined that [CLECs] are nondominant, and that nondominant carriers, 'by definition,' cannot exercise market power.") See also 47 C.F.R. § 61.201 (detariffing ILEC business data services). Moreover, even if a tariff were filed (which is no longer permitted for interexchange services, including interexchange private lines), these are rates charged by a nondominant carrier and thus would be considered prima facie lawful and permitted to take effect on one day's notice. See 47 C.F.R. § 1.773(a)(ii). As such, although the margins for individual contract prices vary, as would be expected under competitive bidding in which bids are submitted in advance based on estimated costs, that variance does not create a basis for determining these rates to be unreasonable or not cost-based. Indeed, forcibly setting a different rate distorts the market and harms consumers. See Nat'l Ass'n of Telecommunications Officers & Advisors v. Fed. Commc'ns Comm'n, 862 F.3d 18, 25 (D.C. Cir. 2017) ("Rate regulation of a firm in a competitive market harms consumers.")

The TeleQuality 2018 Interstate Rate Cost Justification (Attachment 2) contains forward-looking estimates of TeleQuality's costs during the 2018 Funding Year, and thus contains business-sensitive confidential information. Pursuant to Sections 0.457 and 0.459 of the Commission's rules, 47 C.F.R. §§ 0.457, 0.459, TeleQuality hereby requests confidential treatment of Attachment 2, which should be withheld from public inspection.

In support of this request, TeleQuality hereby states as follows:

1. Identification of Specific Information for Which Confidential Treatment Is Sought (Section 0.459(b)(1))

TeleQuality seeks confidential treatment with respect to the TeleQuality 2018 Interstate Rate Cost Justification (the "Confidential Information"). TeleQuality does not seek confidential treatment with respect to the information contained in the TeleQuality 2018 Interstate Rate Sheet.

2. Description of Circumstances Giving Rise to the Submission (Section 0.459(b)(2))

TeleQuality is disclosing the Confidential Information pursuant to 47 C.F.R. § 54.607(b)(1). TeleQuality needs to establish some of its rural rates under the Telecommunications Program by submitting those rates to the Commission. As required by the rules, the submission must include "a justification of the proposed rural rate, including an itemization of the costs of providing the requested service." *Id*.

Ms. Marlene H. Dortch June 25, 2018 Page 3 of 4

3. Explanation of the Degree to Which the Information Is Commercial or Financial, or Contains a Trade Secret or Is Privileged (Section 0.459(b)(3))

The information in the TeleQuality 2018 Interstate Rate Cost Justification is commercial or financial and contains trade secret information. The justifications for TeleQuality's rates include detailed information regarding the prices TeleQuality pays to its wholesale providers as well as TeleQuality's own costs to serve HCPs. In addition, the Cost Justification includes information about how TeleQuality provisions services to HCPs to meet their unique business needs; this information describes TeleQuality's internal business practices and techniques and is sensitive commercial information.

4. Explanation of the Degree to Which the Information Concerns a Service that Is Subject to Competition (Section 0.459(b)(4))

The market for the services at issue is subject to competition; the level of competition varies based on the element of the service and the specific location.

5. Explanation of How Disclosure of the Information Could Result in Substantial Competitive Harm (Section 0.459(b)(5))

First, disclosure of the information in the response would provide TeleQuality's competitors with sensitive insights related to TeleQuality's services and how it provisions its services to meet its customers' unique needs. Disclosure of this information would allow TeleQuality's competitors to use this information to determine TeleQuality's competitive position and associated revenues and thereby gain a competitive advantage. Second, disclosure of TeleQuality's Confidential Information would place TeleQuality at a competitive disadvantage, as TeleQuality lacks the same information regarding its competitors. Third, disclosure of the information could damage TeleQuality's relationships with its wholesale providers, to the extent that it has purchased wholesale inputs at rates that are not generally publicly available. Finally, disclosure of this information could harm the competitive bidding process in the RHC program.

6. Identification of Any Measures Taken to Prevent Unauthorized Disclosure (Section 0.459(b)(6))

The Cost Justification has been kept private and internal to TeleQuality and its parent company. Each page of Attachment 2 is clearly marked "TeleQuality Proprietary – Not for Public Disclosure."

7. Identification of Whether the Information Is Available to the Public and the Extent of Any Previous Disclosure of the Information to Third Parties (Section 0.459(b)(7))

TeleQuality has not previously disclosed to third parties, other than its counsel, its parent company, and relevant state commissions any of the information in the Cost Justification.

June 25, 2018 Page 4 of 4

8. Justification of Period During Which the Submitting Party Asserts that Material Should Not Be Available for Public Disclosure (Section 0.459(b)(8))

TeleQuality requests that the Cost Justification not be disclosed for 10 years from the date of this request. By that time, the sensitivity of TeleQuality's commercial information will have diminished, as market changes will render it increasingly dated, and would make it difficult for competitors to gauge TeleQuality's current market position and revenues.

* * * *

Should you have further questions or require additional information in order to grant the requested confidentiality treatment, please contact me immediately so that I can provide further assistance to resolve this matter.

Sincerely,

John T. Nakahata

Counsel to TeleQuality Communications, LLC

Attachs.

Circuit Information		
Circuit Address 4309 Stagecoach Road, Dunsmir, CA 960		
Billing Account Number	MCC.CA.0001	
Speed	100 mb Ethernet	
Rate	\$ 850.00	
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information		
ircuit Address 906 N 1st St, Grants, NM 870		
Billing Account Number	VDS.AZ.0001	
Speed	100 mb Ether	net
Rate	\$	3,800.00
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs		-
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information			
Circuit Address	t Address 717 Abrahams Rd, Ste D, Moriarty, NM 8703		
Billing Account Number	VDS.AZ.0002		
Speed	100 mb Ethernet		
Rate	\$ 3,895.00		
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs	-		
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Information			
Circuit Address	101 Letton Dr, Raton, NM 87740		
Billing Account Number	VDS.AZ.0003		
Speed	100 mb Ethernet		
Rate	\$ 3,917.53		
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs	-		
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Information			
Circuit Address	717 Abrahams Rd, Ste D, Moriarty, NM 87035		
Billing Account Number	VDS.AZ.0005		
Speed	100 mb Et	thernet	
Rate	\$	4,273.02	
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs		-	
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Information			
Circuit Address	717 Abrahams Rd, Ste D, Moriarty, NM 87035		
Billing Account Number	VDS.AZ.0006		
Speed	100 mb Ethernet		
Rate	\$ 4,273.02		
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs	-		
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Information			
Circuit Address	717 Abrahams Rd, Ste D, Moriarty, NM 87035		
Billing Account Number	VDS.AZ.0007		
Speed	100 mb Ethernet		
Rate	\$ 4,273.02		
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs	-		
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Information			
Circuit Address	717 Abrahams Rd, Ste D, Moriarty, NM 87035		
Billing Account Number	VDS.AZ.0008		
Speed	100 mb Ethernet		
Rate	\$ 4,360.62		
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs	-		
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Information			
Circuit Address	906 N 1st St,	Grants, NM 87020	
Billing Account Number	VDS.AZ.0009		
Speed	100 n	nb Ethernet	
Rate	\$	4,055.00	
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs		-	
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Information		
Circuit Address	101 Letton Dr, Raton, NM 87740	
Billing Account Number	VDS.AZ.0010	
Speed	100 mb Ethernet	
Rate	\$ 1,380.00	
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information			
Circuit Address	Address 906 N 1st St, Grants, NM 8702		
Billing Account Number	VDS.AZ.0011		
Speed	100 mb Ethernet		
Rate	\$ 1,380.	00	
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs	-		
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Information			
Circuit Address	717 Abrahams Rd, Ste D, Moriarty, NM 87035		
Billing Account Number	VDS.AZ.0012		
Speed	100 mb Ethernet		
Rate	\$ 1,380.	.00	
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs	<u> </u>	-	
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Information		
Circuit Address	1810 Highway 508, Onalaska, W	/A 98570
Billing Account Number	VVH.WA.0001	
Speed	N x T-1	
Rate	\$	1,505.00
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs		-
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information		
Circuit Address	2045 Highway 61 North, Port Gibson, MS 39	9150
Billing Account Number	CCF.MS.0004	
Speed	100 mb Ethernet	
Rate	\$ 3,99	50.00
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs		-
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information		
Circuit Address	880 Anthony Street, Port Gibson, MS 39	9150
Billing Account Number	CCF.MS.0005	
Speed	100 mb Ethernet	-
Rate	_ _ \$ 3,99	50.00
Cost Itemization -	_ _	
Circuit Costs	\$	
Transport and Interconnection costs		-
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information	
Circuit Address	1441 NE 10th Ave, Payette, ID 83661
Billing Account Number	VFH.ID.0002
Speed	100 mb Ethernet
Rate	
	\$ 2,710.00
Cost Itemization -	
Circuit Costs	\$
Transport and Interconnection costs	-
Operating and service delivery costs	
Working capital	
Pre-tax cost itemization	
Federal and State Income Tax	
Margin	
Percentage Margin	

Circuit Information		
Circuit Address	2327 SW 4th Ave, Ontario, OR 97914	
Billing Account Number	VFH.ID.0010	0
Speed	50 m	nb Ethernet
Rate	\$	2,710.00
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs		-
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information	
Circuit Address 110 Spring Street North, Talladega, Al	
Billing Account Number	QUA.AL.0035
Speed	100 mb Ethernet
Rate	\$ 6,699.00
Cost Itemization -	
Circuit Costs	\$
Transport and Interconnection costs	-
Operating and service delivery costs	
Working capital	
Pre-tax cost itemization	
Federal and State Income Tax	
Margin	
Percentage Margin	

Circuit Information		
Circuit Address 2016 Main Avenue SW, Cullman, A		35055
Billing Account Number	QUA.AL.0036	
Speed	20 mb Ethernet	
Rate	\$	5,199.00
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs		-
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information		
Circuit Address 12062 Alabama Highway 227, Geraldine, AL 35974		35974
Billing Account Number	QUA.AL.0037	
Speed	20 mb Ethernet	
Rate	\$ 5,199.00	
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information	
Circuit Address 8225 Al Highway 75, Horton, AL 3598	
Billing Account Number	QUA.AL.0038
Speed	20 mb Ethernet
Rate	\$ 5,199.00
Cost Itemization -	
Circuit Costs	\$
Transport and Interconnection costs	-
Operating and service delivery costs	
Working capital	
Pre-tax cost itemization	
Federal and State Income Tax	
Margin	
Percentage Margin	

Circuit Information		
Circuit Address	64 Giles Street, Heflin, AL 36264	
Billing Account Number	QUA.AL.0045	
Speed	20 mb Ethernet	
Rate	\$	5,199.00
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs		-
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information		
Circuit Address 1000 Lincoln Avenue, Oneonta, AL 35		35121
Billing Account Number	QUA.AL.0049	
Speed	20 mb Ethernet	
Rate	\$	5,199.00
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs		-
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information	
Circuit Address	203 Tallapoosa Street, Wadley, AL 36276
Billing Account Number	QUA.AL.0050
Speed	20 mb Ethernet
Rate	\$ 5,199.00
Cost Itemization -	
Circuit Costs	\$
Transport and Interconnection costs	-
Operating and service delivery costs	
Working capital	
Pre-tax cost itemization	
Federal and State Income Tax	
Margin	
Percentage Margin	

Circuit Information			
Circuit Address	40745 Highway 77, Ashland, AL 36251		
Billing Account Number	QUA.AL.0051		
Speed	20 mb Ethernet		
Rate	\$	5,199.00	
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs		-	
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Information		
Circuit Address	4055 Highway 9, Cedar Bluff, AL 35959	
Billing Account Number	QUA.AL.0052	
Speed	20 mb Ethernet	
Rate	\$ 5,199.00	
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circui	t Information	
Circuit Address	4350 Cleveland Avenue, Walnut Grove, AL 35990	
Billing Account Number	QUA.AL.0053	
Speed	20 mb Ethernet	
Rate	\$ 5,199.00)
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information			
Circuit Address	1201-B Notasulga Rd, Tuskegee, AL 36083		
Billing Account Number	QUA.AL.0054		
Speed	20 mb Ethernet		
Rate	\$ 5,199.0)0	
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs	-		
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Information			
Circuit Address	714 12th St W, Jasper, AL 35501		
Billing Account Number	CAP.AL.0002		
Speed	20 mb Ethernet		
Rate	\$ 2,359.00		
Rate	\$ 2,359.00		
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs	-		
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Information			
Circuit Address	156 3rd Avenue, Nauvoo, AL 35578		
Billing Account Number	CAP.AL.0004		
Speed	DS3 - 45 mb		
Rate	\$ 8,993.00		
Cost Itemization -			
Cost iternization -			
Circuit Costs			
Transport and Interconnection costs	-		
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
FTE-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Information		
Circuit Address	5947 Highway 269, Parrish, AL 35580	
Billing Account Number	CAP.AL.0005	
Speed	100 mb Ethernet	
Rate	\$ 3,750.00	
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		
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Circuit Information			
Circuit Address	205 South Street, Fort Bragg, CA 95437		
Billing Account Number	MEN.CA.0007		
Speed	1 gb Ether	net	
Rate	\$	7,133.00	
Cost Itemization -			
Circuit Costs	\$		
Transport and Interconnection costs		-	
Operating and service delivery costs			
Working capital			
Pre-tax cost itemization			
Federal and State Income Tax			
Margin			
Percentage Margin			

Circuit Information	
Circuit Address	770 West Ridge, Wytheville, VA 24382
Billing Account Number	MRC.VA.0001
Speed	300 mb Ethernet
Data	¢ 9.031.00
Rate	\$ 8,031.00
Cost Itemization -	
Circuit Costs	\$
Transport and Interconnection costs	-
Operating and service delivery costs	
Working capital	
Pre-tax cost itemization	
Federal and State Income Tax	
rederal and State income Tax	
Margin	
Percentage Margin	

Circuit Information	
Circuit Address	525 W Monroe, Wytheville, VA 24354
Billing Account Number	MRC.VA.0003
Speed	50 mb Ethernet
Rate	\$ 3,120.00
Cost Itemization -	
Circuit Costs	\$
Circuit costs	3
Transport and Interconnection costs	-
Operating and service delivery costs	
Working capital	
Pre-tax cost itemization	
Pre-tax cost iternization	
Federal and State Income Tax	
Margin	
Percentage Margin	

Circuit Information		
Circuit Address	121 Broad Street, Marion, VA 24354	
Billing Account Number	MRC.VA.0005	
Speed	20 mb Ethernet	
Rate	\$ 1,950.00	
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information	
Circuit Address 6999 Carrolton Pike, Galax, VA	
Billing Account Number	MRC.VA.0006
Speed	100 mb Ethernet
Rate	\$ 5,200.00
Cost Itemization -	
Circuit Costs	\$
Transport and Interconnection costs	-
Operating and service delivery costs	
Working capital	
Pre-tax cost itemization	
Federal and State Income Tax	
Margin	
Percentage Margin	

Circuit Information	
Circuit Address	56 Carroll House Lane, Hillsville, VA 24343
Billing Account Number	MRC.VA.0007
Speed	10 mb Ethernet
Rate	\$ 1,560.00
Cost Itemization -	
Circuit Costs	\$
Transport and Interconnection costs	-
Operating and service delivery costs	
Working capital	
Pre-tax cost itemization	
Federal and State Income Tax	
Margin	
Percentage Margin	

Circuit Information		
Circuit Address	2095 Fourth Street, Wythev	ille, VA 24382
Billing Account Number	MRC.VA.0008	
Speed	10 mb Etherne	t
		1.500.00
Rate	\$	1,560.00
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs		-
Operating and service delivery costs		
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Margin		
Percentage Margin		

Circuit Information		
Circuit Address	1089 Terrace Dr, Marion, VA 24354	
Billing Account Number	MRC.VA.0009	
Speed	10 mb Ethernet	
Rate	\$ 1,560.00	
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin	10.8%	

Circuit Information		
Circuit Address 401 N Jefferson St, Galax, VA		
Billing Account Number	MRC.VA.0010	
Speed	10 mb Ethernet	
Data		
Rate	\$ 1,560.00	
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
rederal and State income Tax		
Margin		
Percentage Margin		

Circuit Information	
Circuit Address	110/108 Bedwell St, Independence, VA 24348
Billing Account Number	MRC.VA.0011
Speed	10 mb Ethernet
Rate	\$ 1,560.00
Cost Itemization -	
Circuit Costs	\$
Transport and Interconnection costs	-
Operating and service delivery costs	
Working capital	
Pre-tax cost itemization	
Federal and State Income Tax	
Margin	
Percentage Margin	

Circuit Information	
Circuit Address	271 Mountain Empire Road, Atkins, VA 24311
Billing Account Number	MRC.VA.0012
Speed	10 mb Ethernet
Rate	\$ 1,560.00
Cost Itemization -	
Circuit Costs	\$
Transport and Interconnection costs	-
Operating and service delivery costs	
Working capital	
Pre-tax cost itemization	
Federal and State Income Tax	
Margin	
Percentage Margin	

Circuit Information		
Circuit Address	494 Industrial Park Dr, Hillsville, VA 24343	3
Billing Account Number	MRC.VA.0013	
Speed	10 mb Ethernet	
Rate	\$ 1,560.0)0
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information		
Circuit Address	120 Tremough Dr, Wytheville, VA 24382	
Billing Account Number	MRC.VA.0014	
Speed	10 mb Ethernet	
	1.500.00	
Rate	\$ 1,560.00	
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Tronking capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Porcontago Margin		
Percentage Margin		

Circuit Information		
Circuit Address	225 George James Rd, Wytheville, VA 24382	
Billing Account Number	MRC.VA.0015	
Speed	10 mb Ethernet	
Rate	\$ 1,560.00	
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information		
Circuit Address	3545 Carrolton Pike, Woodlawn, VA 24381	
Billing Account Number	MRC.VA.0016	
Speed	10 mb Ethernet	
Rate	\$ 1,560.00	
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information		
Circuit Address	410 W Main Street, Wytheville, VA 24381	
Billing Account Number	MRC.VA.0017	
Speed	10 mb Ethernet	
Rate	\$ 1,560.00	
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information		
Circuit Address	115 North Church Street, Marion, VA 24354	
Billing Account Number	MRC.VA.0018	
Speed	10 mb Ethernet	
Rate	\$ 1,560.00	
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information		
Circuit Address	506 E Main Street, Marion, VA 24354	
Billing Account Number	MRC.VA.0020	
Speed	100 mb Ethernet	
Rate	\$ 5,200.00	
nate	φ 3,200.00	
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information		
Circuit Address 416 E Main St, Marion, V		
Billing Account Number	MRC.VA.0021	
Speed	100 mb Ethernet	
Rate	\$ 5,200.00	
inate	3,200.00	
Cost Itemization -		
Circuit Costs	\$	
Transport and luterespection costs		
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Due tour out it and institut		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information		
Circuit Address	770 West Ridge Rd, Wytheville, VA 24382	
Billing Account Number	MRC.VA.0022	
Speed	1 gb Etherne	t
Rate	\$	16 000 00
Rate	Ş	16,000.00
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs		-
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information		
Circuit Address	108 Bedwell Street, Independence, VA 24348	
Billing Account Number	MRC.VA.0023	
Speed	100 mb Ethernet	
Rate	\$ 5,200.00	
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information		
Circuit Address	1590 North Main Street, Marion, VA 24354	
Billing Account Number	MRC.VA.0024	
Speed	100 mb Ethernet	
Rate	\$ 5,200.00	
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs	-	
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information	
Circuit Address	1520 South 4th Street, Greenville, IL 62246
Billing Account Number	BCH.IL.0001
Speed	100 mb Ethernet
Rate	\$ 1,666.00
Cost Itemization -	
Circuit Costs	\$
Transport and Interconnection costs	-
Operating and service delivery costs	
Working capital	
Pre-tax cost itemization	
Federal and State Income Tax	
Margin	
Percentage Margin	

Circuit Information		
Circuit Address	406 North Spring Street, Pe	erryville, MO 63775
Billing Account Number	CCC.MO.0002	
Speed	20 mb Eth	nernet
Rate	\$	2,380.00
Cost Itemization -		
Circuit Costs	\$	
Transport and Interconnection costs		-
Operating and service delivery costs		
Working capital		
Pre-tax cost itemization		
Federal and State Income Tax		
Margin		
Percentage Margin		

Circuit Information	
Circuit Address	820 Park Drive, Ste Genevieve, MO 63670
Billing Account Number	CCC.MO.0003
Speed	100 mb Ethernet
Rate	\$ 3,575.00
Cost Itemization -	
Circuit Costs	\$
Transport and Interconnection costs	-
Operating and service delivery costs	
Working capital	
Pre-tax cost itemization	
Federal and State Income Tax	
Margin	
Percentage Margin	

Circuit Information				
Circuit Address	1250 East US Highway 36, Tuscola, IL 61953			
Billing Account Number	DCH.IL.0001			
Speed	100 mb Ethernet			
Rate	\$ 4,183.00			
Cost Itemization -				
Circuit Costs	\$			
Transport and Interconnection costs	-			
Operating and service delivery costs				
Working capital				
Pre-tax cost itemization				
Federal and State Income Tax				
Margin				
Percentage Margin				

Circuit Information				
Circuit Address	301 East Main Street, Beggs, OK 74421-0478			
Billing Account Number	CRH.OK.0001			
Speed	45mb DS3			
Rate	\$ 19,587.00			
Cost Itemization -				
Circuit Costs	\$			
Transport and Interconnection costs	-			
Operating and service delivery costs				
Working capital				
Pre-tax cost itemization				
Federal and State Income Tax				
Margin				
Percentage Margin				

TeleQuality Operating Cost Allocations			
	\$		% of Income
Total Income	\$		
Estimated Expenses:			
Personnel - payroll, benefits and payroll taxes			
Operating - facilities, customer support, software, equipment, travel and insurance			
Administrative			
Bad debt expense			
Marketing			
Taxes and fees (other than income taxes)			
Total Estimated Expense	\$		
Overhead Expense Factor			
Excludes costs for meals and entertainment, debt costs inc	cluding origination	on and interes	st expense,
late fees and charitable contributions			
Estimated based on historical data			

CERTIFICATE OF SERVICE

I, Remington Pool, hereby certify that on this day, a true and correct copy of the foregoing letter was filed on ECFS and hand-delivered to, and filed with, the Office of the Secretary at the Federal Communications Commission.

Remington Pool June 25, 2018